

Canon Comments on Energy Star Imaging Equipment Final Draft

(1) Page 2, lines 36- 47

We think that only the labeling of ENERGY STAR on product and the manufacturer's Internet site(items 1 and 2) should be indispensable, and labeling on product literature and on product packaging/boxes (items 3 and 4) should be voluntary. The specification of ENERGY STAR will be revised every 2 years and there are no Grandfathering. Therefore , current qualified models may often not be able to meet the next specification. On the other hand, product literatures and packaging for a product model are produced separately, often in bulk. If items 3 and 4 continue to be indispensable, we will be not able to use those product literature and product packaging/boxes that were already produced for former qualified products. They will become large quantities of waste inevitably, and adverse environmental impacts will arise.

Therefore, we would like to propose labeling on product literature and on product packaging/boxes (items 3 and 4) be voluntary. Otherwise, some transfer period only for product literature and on product packaging/boxes should be granted so that such literature or packaging would not be waste.

(2) Page 12, in the TEC Tables 1 and 2

As marking technology, "Mono High Performance IJ" is added to TEC table 1 and "Color High Performance IJ" is added to TEC table 2 newly.

However, a definition of "High Performance IJ" is not described as "Marking Technologies" in page 5 of this draft .

For clarification, we would like to request to add a definition of "High Performance IJ" to "Marking Technologies" in "1) Definitions", and to show typical types of products which are fallen under this category.

(3) Pages 15-16- qualifying products

We would like to propose to add a "FAX modem" in the table 3-OM functional adders as "Other".

"FAX modem" can be regarded as a similar item as network-connection port, because "FAX modem" always keeps waiting for the call from outside in operational mode.

We suppose around 1 W would be suitable as the functional adder allowances for FAX modem. We can prepare the related data if necessary.

(4) Pages 15-16- qualifying products

We would like to propose to integrate "Scanners with CCFL lamps" and "Scanners with non-CCFL lamps".

The Version1.1 distinguishes those scanners, because CCFL lamps and others were considered as having different way of use. But both lamps of the light source are OFF at the sleep mode and both electric power consumptions in sleep are the same. Therefore, we think there is no reason to distinguish "Scanners with CCFL lamps" and "Scanners with non-CCFL lamps".

Moreover, for example, LED is energy saving because it has little electric power consumption at the time of operation as compared with the light source of CCFL. Furthermore LED is eco-friendly components because it has little content of harmful matter, such as mercury, far as compared with the light source of CCFL. However, current draft does not give consideration on the business effort that has adopted LED by giving more adders for CCFL lamps.

For these reasons, we think scanners should have only one adder. The functional adder allowances for "Scanners" should be decided based on all the scanners' data.

(5) “ENERGY STAR® Qualified Imaging Equipment Typical Electricity Consumption (TEC) Test Procedure” pages 1-2

This comment (5) are not on the “Requirements for Imaging Equipment Version 1.1 – DRAFT 1”, but on the test method, “Qualified Imaging Equipment Typical Electricity Consumption (TEC) Test Procedure” (hereinafter, referred as “TEC Test Procedure”). We submitted a request that this matter should be reviewed in the IE Specification ver 1.1, but current draft does not include any reference in this matter. Therefore, we would like to submit again this comment.

In the TEC Test Procedure, the test condition for printers and MFD that a network connection is possible is prescribed as follows. (TEC Test Procedure, Page 2, lines 4-8, “Auto-off and Network Enabling” in “2. Test Parameters”)

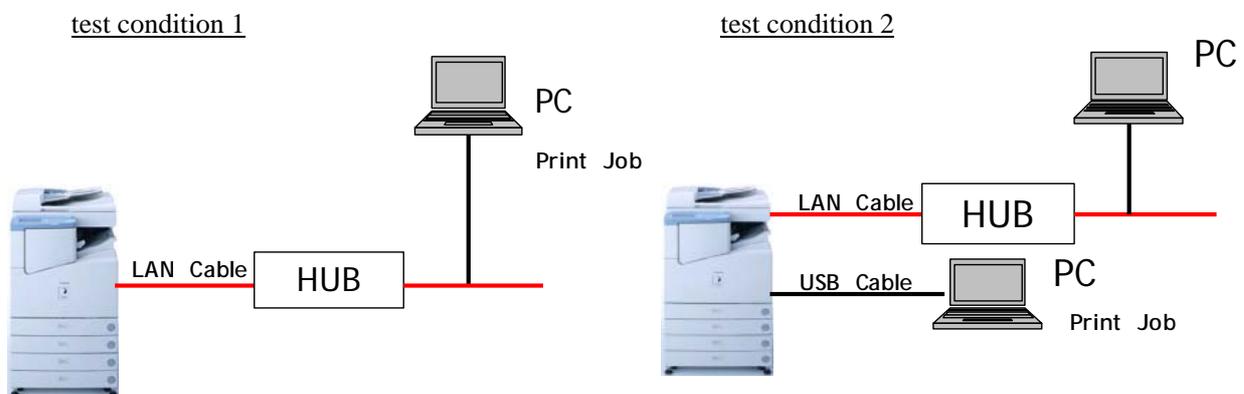
“Printers and MFDs that are capable of being network-connected as-shipped shall be connected to a network. The type of network connection (or other data connection if not capable of being networked) is at the discretion of the manufacturer, and the type used shall be reported. Print jobs for the test may be sent via non-network connections (e.g., USB), even on those units that are network-connected.”

We would like to propose again two postscripts as the test parameters for products capable of network connection as below:

1. At least one PC shall be connected on a network; and
2. When print jobs for the test are transmitted from a network connection, all the setting of printing of the PC shall be a set of default conditions..

In short, in the test, products capable of being networked must connect network including more than one PC and PC setting must be default one. (Those are the test conditions that we would like to add to at this time.) But print jobs may sent through non-network connections like USB as before.

The figure of test conditions which we consider as appropriate may be one of the two compositions below :



The reason why we propose the postscripts, for example, as follows: sometimes resulted TEC value largely may differ from the condition whether the network connected to the product includes a PC or not, when the print jobs are sent via a non-network connection (USB). In addition, there are also the cases where differences in TEC values are caused by setting of the connected PC. If there are not two postscripts as claimed in the above, TEC values might vary because of the variation of test conditions which every producer set, and therefore, it becomes difficult to compare TEC values closely.

This is a suggestion in the purpose to make uncertain points in the test condition clear, in considering that there were misrecognition and confusion on these points in the industry in the past. We would like to ask the EPA for making a review on this matter at this opportunity, if possible.